

Jeffrey F. Barr (NV Bar No. 7269)  
8275 South Eastern Avenue, Suite 200  
Las Vegas, NV 89123  
(702) 631-4755  
barrj@ashcraftbarr.com

Thomas R. McCarthy\* (VA Bar No. 47145)  
Gilbert C. Dickey\* (VA Bar No. 98858)  
Conor D. Woodfin\* (VA Bar No. 98937)  
1600 Wilson Boulevard, Suite 700  
Arlington, VA 22209  
(703) 243-9423  
tom@consovoymccarthy.com  
gilbert@consovoymccarthy.com  
conor@consovoymccarthy.com

Sigal Chattah (NV Bar No. 8264)  
5875 S. Rainbow Blvd #204  
Las Vegas, NV 89118  
(702) 360-6200  
sigal@thegoodlawyerlv.com

*\*Admitted pro hac vice*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

REPUBLICAN NATIONAL COMMITTEE,  
NEVADA REPUBLICAN PARTY, and SCOTT  
JOHNSTON,

Plaintiffs,

v.

FRANCISCO AGUILAR, *in his official capacity  
as Nevada Secretary of State*; LORENA  
PORTILLO, *in her official capacity as the  
Registrar of Voters for Clark County*; WILLIAM  
"SCOTT" HOEN, AMY BURGANS, STACI  
LINDBERG, and JIM HINDLE, *in their official  
capacities as County Clerks*,

Defendants.

No. 2:24-cv-00518-CDS-MDC

**PLAINTIFFS'  
UNOPPOSED MOTION  
FOR EXTENSION OF  
TIME TO AMEND  
COMPLAINT**

Last week, the Court issued an order granting the motions to dismiss. *See* Doc. 121. The Court ordered the Plaintiffs to file a motion for leave to amend the complaint by November 1, 2024. The Plaintiffs file this unopposed motion requesting an additional 10 days to amend their complaint.

1        There is good cause to extend the deadline by ten days. *See* Fed. R. Civ. P. 6.  
2        The Plaintiffs' amended complaint is currently due four days before the national  
3        federal election on November 5. Appellants—the Republican National Committee,  
4        Nevada Republican Party, and the Donald J. Trump campaign—have numerous  
5        obligations before and after election day, as do their counsel. Those obligations become  
6        more numerous and more urgent as the election nears.

7        For example, Plaintiffs and their counsel have been involved in numerous  
8        emergency lawsuits over the past month that affect registration, voting, and the  
9        administration of the upcoming election. *E.g.*, *Ga. State Conf. of the NAACP v. Kemp*,  
10       No. 1:24-cv-4546 (N.D. Ga. Oct. 7, 2024) (TRO proceedings filed and resolved within  
11       four days); *Abhiraman v. State Election Board*, No. 24CV010786 (Ga. Super. Ct. Aug.  
12       26, 2024) (pending decision on bench trial expedited one month after the complaint  
13       was filed); *Eternal Vigilance Action, Inc. v. State of Georgia*, No. 24CV011558 (Ga.  
14       Super. Ct. Aug. 26, 2024) (expedited trial and Georgia Supreme Court petition  
15       resolved this week).

16       These emergency proceedings often require putting other briefing obligations  
17       on hold. For example, the RNC and undersigned counsel have an Eleventh Circuit  
18       brief due on October 30, the day before amendment is due in this case. But because  
19       briefing in that case is consolidated, the RNC has less leeway to request an extension.  
20       The election season requires parties to prioritize cases that will affect the upcoming  
21       election. But this is not one of those cases. Plaintiffs thus request an additional ten  
22       days to file their motion for leave to amend the complaint, to avoid briefing that motion  
23       in the midst of the national election. No party opposes this extension request.

1 Dated: October 25, 2024

Respectfully submitted,

2 /s/ Jeffrey F. Barr

3 Thomas R. McCarthy\*  
4 VA Bar No. 47145  
Gilbert C. Dickey\*  
5 VA Bar No. 98858  
Conor D. Woodfin\*  
6 VA Bar No. 98937  
CONSOVOY MCCARTHY PLLC  
7 1600 Wilson Boulevard, Suite 700  
Arlington, VA 22209  
8 (703) 243-9423  
tom@consovoymccarthy.com  
9 gilbert@consovoymccarthy.com  
conor@consovoymccarthy.com

Jeffrey F. Barr  
NV Bar No. 7269  
ASHCRAFT & BARR LLP  
8275 South Eastern Avenue  
Suite 200  
Las Vegas, NV 89123  
(702) 631-4755  
barrj@ashcraftbarr.com

*Counsel for the Republican  
National Committee and Scott  
Johnston*

10 /s/ Sigal Chattah

11 \*admitted pro hac vice

12 *Counsel for Plaintiffs*

Sigal Chattah  
NV Bar No. 8264  
CHATTAH LAW GROUP  
5875 S. Rainbow Blvd #204  
Las Vegas, NV 89118  
(702) 360-6200  
sigal@thegoodlawyerlv.com

13  
14  
15 *Counsel for the Nevada  
Republican Party*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

REPUBLICAN NATIONAL COMMITTEE,  
NEVADA REPUBLICAN PARTY, and SCOTT  
JOHNSTON,

Plaintiffs,

v.

FRANCISCO AGUILAR, *in his official capacity  
as Nevada Secretary of State*; LORENA  
PORTILLO, *in her official capacity as the  
Registrar of Voters for Clark County*; WILLIAM  
"SCOTT" HOEN, AMY BURGANS, STACI  
LINDBERG, and JIM HINDLE, *in their official  
capacities as County Clerks*,

Defendants.

No. 2:24-cv-00518-CDS-MDC

**ORDER GRANTING  
UNOPPOSED MOTION  
FOR EXTENSION OF  
TIME TO AMEND  
COMPLAINT**

The Plaintiffs' motion for leave to amend their complaint is due November 1, 2024. The Plaintiffs have moved to extend that due date by ten days. Noting the motion is unopposed and finding good cause, the Court **GRANTS** the motion and **ORDERS** that the Plaintiffs' motion for leave to amend their complaint is due November 11, 2024.

Dated: October 28, 2024

  
Hon. Maximiliano D. Couvillier III  
United States Magistrate Judge